

CITIZENS UTILITY BOARD

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December 5, 2003

Via Electronic Mail


John E. Rooney
Sonnenschein, Nath & Rosenthal
233 S. Wacker Dr.
Chicago, IL 60606

RE: CUB Responses to Nicor's First Set of Data Requests, ICC Docket No. 02-0067

Dear Mr. Rooney:

Attached for your review please find the Responses of the Citizens Utility Board to the First Set of Data Requests of Nicor. If there are any questions, please do not hesitate to contact me.

Sincerely,


Robert J. Kelter
Director of Litigation

Enc.
Cc: Service List

NG-CUB 1.04

Please produce all documents that analyze, evaluate, discuss, or otherwise evidence the performance of a study, computation, compilation or calculation performed in connection with CUB's review of the gas sale, including the accounting or recording thereof, discussed at pages 20 to 26 of the Lassar Report.

Response:

Jerry Mierzwa and Dave Kolata produced some summaries and analysis regarding the Lassar Report, and the issues discussed in the report, that are product by the attorney-client privilege and work product doctrines.

NG-CUB 1.07

Please produce all documents that analyze, evaluate, discuss, or otherwise evidence the performance of a study, computation, compilation or calculation performed in connection with CUB's review of Nicor Gas' treatment of gas purchases either as flowing gas or gas in storage, including the accounting or recording thereof, during 2000, 2001 or 2002 (reference pages 27 to 36 of the Lassar Report).

Response:

Jerry Mierzwa and Dave Kolata produced some summaries and analysis regarding the Lassar Report, and the issues discussed in the report, that are product by the attorney-client privilege and work product doctrines.

NG-CUB 1.10

Please produce all documents that analyze, evaluate, discuss, or otherwise evidence the performance of a study, computation, compilation or calculation performed in connection with CUB's review of the meter error, including the accounting or recording thereof, discussed at pages 37 to 39 of the Lassar Report.

Response:

Jerry Mierzwa and Dave Kolata produced some summaries and analysis regarding the Lassar Report, and the issues discussed in the report, that are product by the attorney-client privilege and work product doctrines.

NG-CUB 1.13

Please produce all documents that analyze, evaluate, discuss, or otherwise evidence the performance of a study, computation, compilation or calculation performed in connection with CUB's review of the weather insurance purchase, including the accounting or recording thereof, discussed at pages 40 to 48 of the Lassar Report.

Response:

Jerry Mierzwa and Dave Kolata produced some summaries and analysis regarding the Lassar Report, and the issues discussed in the report, that are product by the attorney-client privilege and work product doctrines.

NG-CUB 1.16

Please produce all documents that analyze, evaluate, discuss, or otherwise evidence the performance of a study, computation, compilation or calculation performed in connection with CUB's review of Nicor Gas' use of in- field transfers, or the categorization of transactions or transfers as in- field transfers, including the accounting or recording thereof, during 2000, 2001 or 2002 (reference pages 49 to 56 of the Lassar Report).

Response:

Jerry Mierzwa and Dave Kolata produced some summaries and analysis regarding the Lassar Report, and the issues discussed in the report, that are product by the attorney-client privilege and work product doctrines.

NG-CUB 1.19

Please produce all documents that analyze, evaluate, discuss, or otherwise evidence the performance of a study, computation, compilation or calculation performed in connection with CUB's review of Nicor Gas' use of storage prefills, including the accounting or recording thereof, during 2000, 2001 or 2002 (reference pages 57 to 64 of the Lassar Report).

Response:

Jerry Mierzwa and Dave Kolata produced some summaries and analysis regarding the Lassar Report, and the issues discussed in the report, that are product by the attorney-client privilege and work product doctrines.
See attached.

NG-CUB 1.22

Please produce all documents that analyze, evaluate, discuss, or otherwise evidence the performance of a study, computation, compilation or calculation performed in connection with CUB's review of Nicor Gas' sale of 2.4 bcf of gas to Enerchange in January 2000, including the accounting or recording thereof, discussed at pages 65 to 71 of the Lassar Report.

Response:

Jerry Mierzwa and Dave Kolata produced some summaries and analysis regarding the Lassar Report, and the issues discussed in the report, that are product by the attorney-client privilege and work product doctrines.

NG-CUB 1.25

Please produce all documents that analyze, evaluate, discuss, or otherwise evidence the performance of a study, computation, compilation or calculation performed in connection with CUB's review of Nicor Gas' hedging activities, including the accounting or recording thereof, during 2000, 2001 or 2002 (reference page 72 Of the Lassar Report).

Response:

Jerry Mierzwa and Dave Kolata produced some summaries and analysis regarding the Lassar Report, and the issues discussed in the report, that are product by the attorney-client privilege and work product doctrines.

NG-CUB 1.28

Please produce all documents that analyze, evaluate, discuss, or otherwise evidence the performance of a study, computation, compilation or calculation performed in connection with CUB's review of Nicor Gas' management arrangements with third parties for gas storage and transportation, including management fees and/or accounting or recording thereof, during 2000, 2001 or 2002 (reference page 73 of the Lassar Report).

Response:

Jerry Mierzwa and Dave Kolata produced some summaries and analysis regarding the Lassar Report, and the issues discussed in the report, that are product by the attorney-client privilege and work product doctrines.